THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

Civil Action No. 3:13-CV-59
JURY DEMAND

SELECTIVE INSURANCE COMPANY OF THE SOUTHEAST'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE ISSUE OF BAD FAITH

Defendant, Selective Insurance Company of the Southeast, by and through counsel and pursuant to Federal Rule of Civil Procedure 56, moves the Court to enter partial summary judgment in its favor in the above captioned case. In support of his Motion for Summary Judgment, Selective Insurance Company of the Southeast states that no material facts are in dispute and that it is entitled to a judgment as a matter of law, as set forth more fully in the Affidavit of Sally Stone, the Statement of Undisputed Facts, and the Memorandum of Law filed concurrently in support of this Motion.

Respectfully submitted,

SPICER RUDSTROM PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to those persons requesting notice, including the following:

Kelli L. Thompson, Esq. Baker, Donelson, Bearman, Caldwell & Berkowitz 265 Brookview Centre Way, Suite 600 Knoxville, Tennessee 37919 (865) 549-7000

/s/_Michael J. Vetter, Sr.